

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Revision of Procedures Governing Amendments</b>	)	
<b>To FM Table of Allotments and Changes</b>	)	<b>MB Docket No. 05-210</b>
<b>Of Community of License in the Radio Broadcast</b>	)	<b>RM-10960</b>
<b>Services</b>	)	

**COMMENTS**

Prettyman Broadcasting Company ("PBC") hereby opposes the proposals for changes to the FM allotment process set forth in the Notice of Proposed Rulemaking, FCC 05-120, released June 14, 2005, in the above-referenced docket.

PBC and its majority shareholder, William E. Prettyman, Jr., have a long history of establishing and operating radio stations in the mid-Atlantic region, particularly in smaller markets. Currently, PBC is the licensee of three stations -- WEPM(AM) and WLTF(FM), Martinsburg, West Virginia; and WICL(FM), Williamsport, Maryland -- which are in the Hagerstown-Chambersburg-Waynesboro, MD-PA Arbitron market. Through management and minority ownership positions, Mr. Prettyman most recently has also been involved in the growth and development of First Media Radio, LLC, the licensee of eight AM and 15 FM stations in small towns and communities from North Carolina to Pennsylvania. Mr. Prettyman's experience in fostering radio station growth and operations in the region has been extensive, dating to his first position with WSUX, Seaford, Delaware, in 1957.

Based on this experience, PBC and its founder know that the building and nurturing of good local stations is a slow and deliberate process, requiring much hard work and "tender loving care." Such long-term efforts invariably produce strong local community outlets that engender devotion and loyalty among their listeners. Owners who make these dedicated efforts


on a consistent and long-term basis and are truly "invested" in their stations find that their communities deliver bounteous returns on the investment over the life of their stations.

Changes to the FM allotment Table should similarly be a deliberate process, and PBC disagrees with many of the suggestions that purport to "streamline" the process. PBC particularly opposes any procedural changes that would accelerate the process of changing the Table to facilitate moves of long-established stations in small local communities to larger population centers in nearby metropolitan areas. Such changes should require an exceptionally high public interest showing before a small town is robbed of its local radio service to move a frequency to an already heavily-served area, primarily for the economic gain of the proponent.

In these political times, when media ownership issues, consolidation, and public interest obligations are being debated in Congress, the radio industry should not provide further ammunition to its opponents by advocating procedural changes that jeopardize small-market radio. Not only are such changes bad for the public interest, but they will also be bad for other policy issues affecting broadcasting's future.

PBC respectfully requests that the Commission not take any further action on the proposals set forth in this docket. If the Commission decides, however, that it is compelled to make changes, PBC asks that the "public interest" showing required to justify any allotment modifications be defined to require a demonstration of past local community service and concrete proposals for such continued service.

Respectfully submitted,

By: 

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